

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA, ERIE DIVISION

IN RE: ANGELA J. RYAN a/k/a	:	Bankruptcy No. 15-10973-TPA
ANGELA J. BARKER,	:	Chapter 13
Debtor	:	Document No.
	:	Related Document No.
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ANGELA J. RYAN a/k/a	:	
ANGELA J. BARKER,	:	
Movant	:	
v.	:	
ATLANTIC CREDIT & FINANCE	:	
SPECIAL FINANCE UNIT,	:	
Respondent	:	

**CERTIFICATE OF NO OBJECTION**

AND NOW, comes John R. Lhota, Attorney at Law, John R. Lhota, P.C. Law Offices, counsel of record to the above-captioned Debtor and Movant (hereinafter "Movant"), who files this Certificate of No Objection, a statement of which is as follows:

1. Movant filed a Motion to Avoid Judicial Lien (hereinafter the "Motion") in the above-captioned matter on May 22, 2018.
2. On May 30, 2018, Movant served the above-captioned Respondent and its attorney, William C. Molczan, Weltman Weinberg & Reis Co., with a copy of the Motion, a Notice of Hearing with Response Deadline on the Motion, a Proposed Order and a Proposed Default Order, all of which were filed in the above-captioned case.
3. Responses to the Motion were to be filed on or before the close of business on June 11, 2018.
4. As of the date of this Certificate of No Objection, June 12, 2018, no response, objection or answer to the Motion has been filed of record in the above-captioned matter.
5. As of the date of this Certificate of No Objection, June 12, 2018, Movant's undersigned counsel has not receive a response, objection or answer to the Motion.

WHEREFORE, Movant respectfully requests that the Court issue an Order identical or similar to the Proposed Default Order which accompanied the Motion, avoiding the judicial lien of Respondent identified in the Motion.

Respectfully submitted

/s/John R. Lhota  
Signature of Counsel or Debtor(s) if pro se  
John R. Lhota  
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Dated: June 12, 2018